

IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

IAN HUNTER LUCAS

Plaintiff

vs.

VANDERBILT UNIVERSITY et al.

Defendant

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No. 3:24-CV-01359

**REPLY TO DEFENDANT'S RESPONSE TO MOTION FOR TEMPORARY
RESTRAINING ORDER**

I. Introduction

Plaintiff, Ian Lucas, hereby submits this Reply to Defendant Vanderbilt University's Response to Plaintiff's Motion for Temporary Restraining Order. Plaintiff maintains that the argument presented in support of the Motion for Temporary Restraining Order is well-founded and urgently needed to prevent ongoing irreparable harm.

II. Argument

A. Irreparable Harm

Defendant's contention that Plaintiff will not suffer irreparable harm is unsubstantiated. Plaintiff has suffered significant harm including damage to his academic standing, career prospects, emotional well-being, and reputation. The expulsion from Vanderbilt University, along with detrimental notes on Plaintiff's record, have already affected Plaintiff's ability to enroll in other programs or seek employment in the nursing profession. The ongoing nature of the harm necessitates immediate court intervention.

B. Likelihood of Success on the Merits

Plaintiff reiterates that the likelihood of success on the merits remains strong. The evidence provided points to discriminatory and retaliatory actions by Defendant. Specifically, the retrospective grade alterations and subsequent expulsion following Plaintiff's complaints to the Equal Opportunity Access (EOA) office and other officials align with Plaintiff's claims of retaliatory motives. These actions are in direct contravention of the established legal standards of fairness and non-discrimination.

C. Balance of Equities

The balance of equities decidedly favors Plaintiff. Granting the temporary restraining order will not unduly harm Defendant but will prevent further irreparable damage to Plaintiff's academic and professional future. The reinstatement would be temporary, merely preserving the status quo until the case is resolved. On the other hand, failing to grant the order would result in continued harm to Plaintiff, exacerbating the negative impact on his life and career.

D. Public Interest

Public interest supports the granting of the temporary restraining order. Upholding principles of equality and non-discrimination in educational settings is paramount. Ensuring that educational institutions adhere to fair practices is fundamental to sustaining public trust in academic integrity. Granting the order signals the court's commitment to protecting students from retaliatory and discriminatory acts, promoting a safe and equitable academic environment for all.

III. Conclusion

For the foregoing reasons, Plaintiff respectfully requests that the Court grant the Motion for Temporary Restraining Order to prevent further irreparable harm to Plaintiff's academic standing, career opportunities, emotional health, and reputation.

Respectfully submitted,

/s/ Ian H. Lucas

Ian H. Lucas

Pro Se

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Plaintiff Pro Se

Certificate of Service

I hereby certify that a true and correct copy of the foregoing REPLY TO DEFENDANT'S RESPONSE TO MOTION FOR TEMPORARY RESTRAINING ORDER has been filed and served via the Court's CM/ECF system, which will automatically send notification to all counsel of record, on this 27th day of November 2024.

Respectfully submitted,

/s/ Ian H. Lucas

Ian H. Lucas

Pro Se Plaintiff